National Park Service
U.S. Department of the Interior

Great Falls Park
George Washington Memorial Parkway

Great Falls Park Visitor Center Access Path Ramp and Courtyard Rehabilitation

Great Falls Park
Fairfax County, Virginia

ENVIRONMENTAL ASSESSMENT / ASSESSMENT OF EFFECTS

MAY, 2010

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Great Falls Park Visitor Center Access Path, Ramp and Courtyard Rehabilitation

Summary

The George Washington Memorial Parkway proposes to improve areas around the visitor center at Great Falls Park to provide accessibility for individuals with disabilities that meet current Americans with Disabilities Act (ADA) and Architectural Barriers Act (ABA) standards. This environmental assessment will analyze the impacts of three proposed actions to the Great Falls Park Visitor Center. These proposed actions are:

1. Redesigning and partially realigning the access path leading from the main parking lot to the Visitor Center north entrance ramp and into the courtyard;
2. Modifying the north entrance ramp leading into the Visitor Center; and
3. Resurfacing and making other improvements to the courtyard.

In conjunction with these three actions, the EA will also address deficiencies in storm water drainage that affect the courtyard and access path, the need for providing a drop-off location in the main parking lot, and the installation of minimal lighting along the north ramp and entryway to the Visitor Center.

This EA evaluates multiple alternatives for each of the three primary proposed actions. The National Park Service (NPS) Preferred Alternative includes:

1. Constructing a permeably-paved accessible access path along the route of the existing path which will lead to both the North Ramp and into the courtyard;
2. Redesigning and adjusting the original North Ramp to ensure that the entire ramp is ABA/ADA accessible, with an 8% slope, two intermittent landings, and adding additional accessible railings;
3. Improving the courtyard through resurfacing, installing new storm water drainage systems, and removing vegetative planters to restore the courtyard closer to its original design. This will improve visitor circulation and the views of the Visitor Center.

The impact analysis in this EA concludes that the Preferred Alternative would result in beneficial impacts to visitor experience and safety, and would not have significant adverse impacts on natural and cultural resources.

This Environmental Assessment/Assessment of Effect (EA/AoE) evaluates two alternatives: a no action alternative and a NPS preferred alternative for the proposed action. The EA/AoE further analyzes the potential impacts these alternatives would have on the natural, cultural, and human environment. This document has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended; regulations of the Council on Environmental Quality (CEQ) (40 CFR 1508.9); and NPS Director's Order (DO) #12: Conservation Planning, Environmental Impact Analysis, and Decision-Making. This EA/AoE also complies with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. For the purpose of this analysis, the Great Falls Park Visitor Center will be considered as eligible for listing on the National Registrar of Historic Places.

Public Comment

If you wish to comment on the environmental assessment, the National Park Service prefers that you post comments online at http://parkplanning.nps.gov/gwmp, or you may mail comments to Dottie Marshall, Superintendent, 700 George Washington Memorial Parkway, McLean, VA 22101. This environmental assessment will be on public review for 30 days.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. However, without this information we will not be able to contact you with status updates on this project.

Chapter 1 – Purpose and Need

1.1 Background

The National Park Service is planning to provide enhancements to the Great Falls Park Visitor Center to improve accessibility, appearance and educational opportunities. In 2007, the park completed a General Management Plan with the accompanying Environmental Impact Statement for Great Falls Park. Under the section "Management of Facilities" the park describes enhancing the appearance of the Visitor Center (including the courtyard), configuring the interior spaces more efficiently, and modifying the entrance ramps to meet ABA/ADA requirements. The visitor center is the principal location for visitors to find information about the park. A recently upgraded interior includes new museum and interpretive exhibits, an auditorium, a bookstore and an information desk.

Description of the Park

Great Falls Park, administered by George Washington Memorial Parkway and located in northern Virginia, is a distinctive place within the Washington, DC metropolitan region. It includes dramatic vistas of the Potomac River cascading 76-feet over jagged rocks, through a series of cataracts, and surging through the Mather Gorge. It also includes the preserved ruins of the Patowmack Canal, a designated National Historic Landmark that is a physical reminder of George Washington's efforts to make the river a navigable waterway. Adjacent to the Canal ruins are the ruins of an abandoned settlement, the town of Matildaville, built to support trade along the Canal. The park is also located at the northern end of the 15-mile Potomac River Gorge, one of the country's most ecologically diverse areas, that serves as a confluence for numerous rare plant species and biological communities. Each year, nearly 500,000 people including local residents and tourists enjoy activities such as hiking, biking, horseback riding, rock climbing, kayaking, fishing, picnicking, as well as the spectacular views offered at this 800 acre park.

Relation of Proposal to Other Planning Projects

Recently the interior of the Great Falls Park visitor center was upgraded significantly, with brand new exhibits, visitor contact desk, bookstore and film in the auditorium. As part of this project, the main entrance to the visitor center was relocated to the front-center of the building and enlarged to make it ABA/ADA compliant. The purpose for this was to make the entrance to the visitor center more visible to visitors entering the park from the main parking lot. In addition, the main doors on the lower level of the visitor center (the entrance to the ranger station and the entrance to the break room) were enlarged to become ABA/ADA compliant; however the thresholds and raised saddles in the doorway still act as barriers and may be corrected during rehabilitation of the courtyard.

In 2008, the park installed a small elevator/lift inside the visitor center building to provide ABA/ADA access for employees and visitors. The size of the elevator was constrained by the need to avoid impeding the historic fabric of the visitor center. Prior to this improvement, early scoping to address all ABA/ADA issues associated with the building examined retrofitting the south ramp for visitor center access. In order to build an ABA/ADA accessible ramp on the south side of the visitor center, construction would have had potentially significant adverse impacts to the historic Patowmack Canal (it would have intruded into the canal); the adjacent trail; and the visual aesthetic of the visitor center. It was decided that this option would not be carried forward, and instead the park pursued the installation of an elevator lift inside the visitor center structure as a limited secondary access to the primary main access via the

future north ramp, which would be modified to provide ABA/ADA access for both employees and the public as described in this EA.

As identified in the GMP, a future project would include the installation of new and larger, ABA/ADA compatible restrooms within the lower level of the visitor center building in space currently used as storage. That project may also involve the relocation of staff offices to a new building in the current maintenance yard. Neither of these projects is within the scope of this EA.

Description of the Project Area

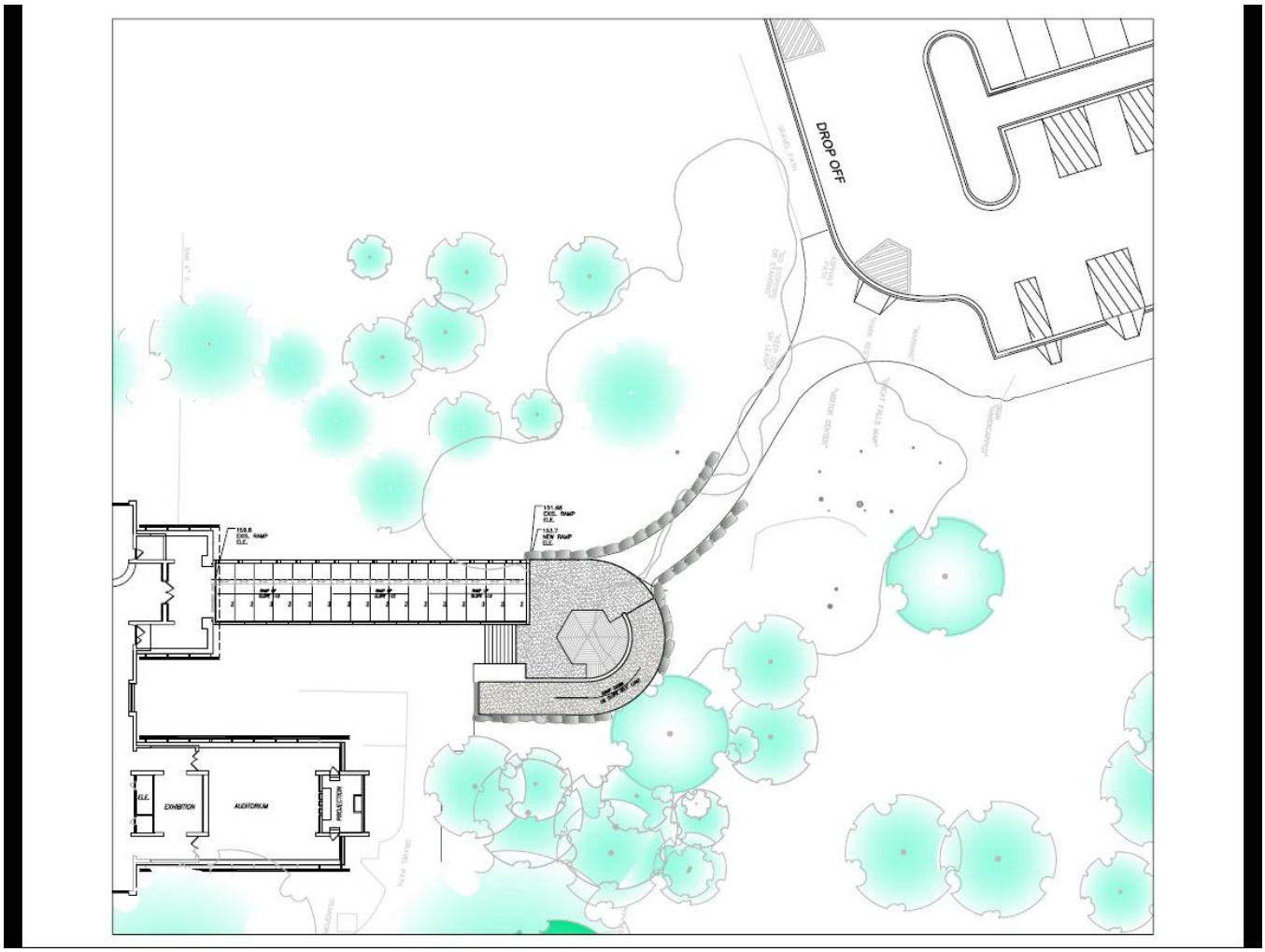
The project area is located on the exterior of the Great Falls Park visitor center and includes the main access path from the parking lot; the wooded area within 100 feet northeast of the existing path between the parking lot and visitor center courtyard; the north ramp leading to the visitor center; and the visitor center courtyard defined by the exterior space in between the two main wings of the building. In addition, the project area includes a small portion of the main parking lot and access path entry points, where changes would be made to accommodate a visitor/delivery drop off point and a change to the access path entry, which could be shifted approximately 100 feet north from current conditions. This would add substantial room for visitors to safely drop-off passengers without backing up circulating traffic (see diagram on the following page). Existing conditions are discussed in detail in Chapter 3 Environmental Consequences.

1.2 Purpose and Need

The Purpose of the project is to improve accessibility to the visitor center for employee and visitor health and safety; to enhance the aesthetic appearance of the visitor center courtyard and entryway leading to the building; to bring the building/courtyard/access path up to current ABA/ADA standards; and to improve the safety of traffic and circulation where the parking lot leads to the visitor center.

Need

- Changing the current design of the access path from the main parking lot and ramp leading to the visitor center is needed to achieve current ABA/ADA standards. Currently, this area is not universally accessible.
- Improving courtyard circulation and safety is needed because of following:
    - There is currently heavy visitor traffic in the courtyard, which limits the flow of visitors.
    - There is significant pooling of water during and after storms.
    - There are currently several uneven surfaces (tripping hazards) throughout the courtyard.
    - Incorporation of lighting is needed because the current lack of lighting creates an unsafe condition as a result of diminished visibility.
- There is a need for a designated location to provide visitors interpretation and guidance within the courtyard.



The improved Drop Off area is shown in the top-right portion of the diagram.

1.3 Issues and Impact Topics

An issue is an effect on a physical, biological, social, or economic resource. The predicted effects of an activity create the issue. Issues may come from the public, within an agency or department, or another agency. For this project, the interdisciplinary team identified the following issues through internal scoping.

1. ABA/ADA issues - Public Access

The Visitor Center Exhibits Area and Auditorium are open to the public and are located on the upper level, thereby requiring an accessible route from parking area to upper level under ABA/ADA. Note: an Accessible Route can include ramps but under revised ABA/ADA guidelines can no longer include a platform lift, as a platform lift calls undue attention to a person's disability.

A small elevator/platform lift on the interior could provide a limited alternative route from upper level to courtyard level, concessionaire, and restrooms. The Accessible Route from upper level to lower level selected by the CBA is the North Ramp (the South Ramp is too steep and lacks intermittent landings).

2. ABA/ADA issues - Disabled Employee Workplace Access

The Visitor Center has an Exhibits area on upper level and park offices and restrooms on lower level which are essential parts of an employee workplace. Rangers and park employees require access to both upper and lower levels to work and use a stairway (not open to public). Reasonable workplace accommodation for employees with disabilities is required of all employers (including federal government) under ABA/ADA.

Modification of the original stairway to provide a new, small interior elevator/platform lift and stairway alternative was selected in CBA to provide for disabled employee access between upper and lower levels. This elevator/platform lift could also provide an alternate accessible route for limited public access to and from the upper level Visitor Center to courtyard level concessionaire and restrooms for persons with disabilities.

3. Courtyard Surface - ABA/ADA barriers and tripping hazards

The concrete panels with wood dividers have differentially settled. To keep water out of lower level interior the door thresholds were elevated during construction to 1" above courtyard. This has created tripping hazards and ABA/ADA access barriers, and resulted in accidents in the courtyard by public and employees. The addition of raised saddles to door thresholds has made crossing the door threshold difficult-to-impossible for wheelchair users. The maximum vertical difference permitted by ABA/ADA and current building code is ¼" (or ½" with 1:2 chamfer on the upper edge). The CBA selected redesign of the courtyard to properly slope away from door thresholds for drainage and to insure that adjoining surfaces remain flush, and ABA/ADA compliant saddles are provided at the doors.

4. The visitor center courtyard suffers from an inadequate storm water drainage system. Ponding and perpetual moist areas after heavy precipitation and ice during cold weather are safety concerns.

During storms throughout the year, the drains in the courtyard cannot handle the excess water and begin to flood. Rain from the storm and water draining off the roof will form large puddles around the drains. This ponding can reach a depth of up to 3-6 inches of water, making it very difficult for visitors to access the courtyard. During the colder months, as water cascades off the visitor

center roof, large icicles will form in the drains overhead. This causes a very dangerous situation as they melt, and the sharp icicles could potentially fall on visitors.

Impact Topics

The impact topics selected for analysis in this EA include the following:

Vegetation

Cultural Resources, including:

- Historic Structures
- Cultural Landscapes

Visitor Use and Experience, including:

- Traffic and visitor circulation
- Aesthetic resources
- Visual/viewshed
- Noise

Facilities and Operations, including:

- Maintenance
- Food Concession

Chapter 3 describes the affected environment for each impact topic analyzed and presents the potential impacts of implementing any of the alternatives.

Impact Topics Dismissed

During internal scoping several impact topics were identified that were initially considered but then dismissed from further analysis in the Environmental Assessment. The following impact topics were dismissed because the Interdisciplinary Team's review of impact issues and the completion of the Environmental Screening Form found there would be no or negligible potential to impact park or surrounding resources:

- Air Quality – amount of emissions from construction equipment is negligible.
- Water Quality/Quantity – This project would result in minimal effects on the water quality and would be mitigated to prevent further effects. The closest water body to the project site is the Potomac River, located approximately 300 feet from the visitor center. Any ground disturbance that would occur would be mitigated with silt fencing.
- Soils – The majority of ground disturbance that would occur as a result of the proposed activities would occur in areas that have already been disturbed or developed; any new ground disturbance would result in less than minor impacts to soils.
- Floodplain – While the proposed action occurs within the 100-year floodplain and there would be a slight modification to the configuration of the ramp and courtyard, these changes would not result in any noticeable changes to the functions and values of the existing floodplain or alter flood flows.
- Species of Special Concern – In the summer of 2008, park biologists surveyed the project area and determined that no federal or state species of special concern were located within the construction area.
- Museum collections (objects, specimens, and archival and manuscript collections). – no museum collections would be impacted.
- Ethnographic Resources – no ethnographic resources are impacted.
- Wildlife – no wildlife would be impacted.
- Archeological resources – no archeological resources would be impacted. This project would be additive (utilizing fill soils), and not involve digging.

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Chapter 2 - Alternatives

2.1 Introduction

This chapter describes a range of options to improve the Great Falls Park access path, north ramp and courtyard. The following is a list of alternatives that potentially meet the purpose and need for the project. This EA explores two alternatives: the No Action Alternative (Alternative A), and an action alternatives (Alternative B), which includes two possible options for the courtyard.

2.2 Alternative A: No Action Alternative

Alternative A, the No Action Alternative, is the continuation of current management (Figure 1). It does not imply or direct discontinuing the present action or removing existing uses, developments or facilities. The No Action Alternative provides a baseline of existing conditions and actions and provides a basis for evaluating the changes and impacts of the action alternatives. If the No Action Alternative were to be selected, the NPS would respond to future needs and conditions without substantial action or policy change.

There would be no change to the circulation in the main parking area between the access path and entrance road. Individual visitors and groups in buses would continue to stop their vehicles near the access path to the visitor center for drop off/pick-up, causing cars to back up and creating safety concerns.

Under the no action alternative, maintenance would continue on an as needed basis. Repairs such as paving holes, filling cracks, repairs to concrete spalling, replacing wood spacers, repairs to the trail, etc., would occur to keep the existing access path, north ramp, and courtyard free from potential hazards.

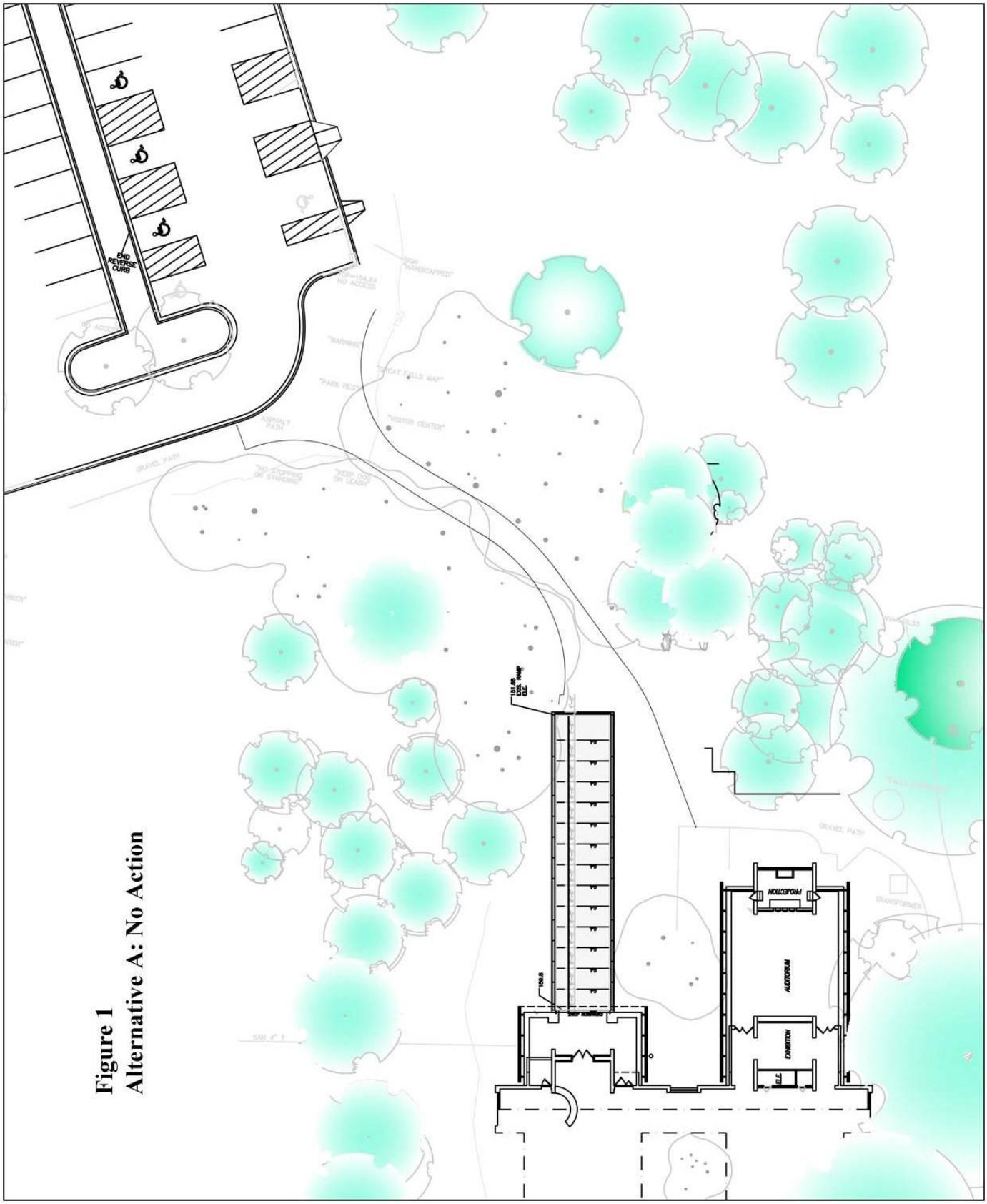


Figure 1
Alternative A: No Action

2.3 Alternative B (NPS Preferred Alternative): Construct Paved Access Path, North Ramp, and Courtyard

New Drop-off area in the main parking lot In the initial scoping the issue of vehicle traffic circulation in the main parking lot adjacent to the access path leading to the visitor center was addressed. Currently, vehicles stop to drop-off or pickup passengers, which interrupt the traffic flow into and out of the main parking lot. To correct this problem the park is proposing to create a drop-off that could support busses and delivery trucks as well as individual vehicles. This would require striping, realigning the existing median and enlarging the space at this location where vehicles are turning to enter the main parking lot. Although this would require use of an existing parking space, restriping of parking spaces would not result in loss of overall parking. This element of the project is common to all action alternatives and options.

Temporary trail and access
During construction it will be necessary to close off portions of the project area from visitor and park employee access. A temporary trail from the main parking lot along the entrance road behind the visitor center and staff offices will be constructed on an existing gravel trail and paved parking area. The trail will be improved but may not meet all ABA/ADA requirements because it is temporary. The trail will connect to the north end of the courtyard, south ramp to the visitor center and overlooks.

Lighting
Although the park is closed at dark, visitors and staff may be departing at near-dark or dark conditions. An existing flood lamp on the visitor center is insufficient to provide adequate lighting from the visitor center to the parking lot. The park is proposing to provide minimal lighting on the newly ABA/ADA designed north ramp and along the access path up the parking lot.

Railings on the north ramp of the visitor center
Metal hand rails will be installed for ABA/ADA access on the visitor center's north ramp. This would require three railings – one along both the west and east side of the ramp and another approximately five feet toward the center of the ramp. In addition, the heights of the wooden railings, which are currently 18 inches, are insufficient to meet safety code requirements. A 42-inch barrier is required. In order to meet this requirement, an additional course stone will be added raising the wooden railings to meet the 42-inch standard. The top course of stone will be chamfered (a beveled edge connecting two surfaces) to discourage visitors from climbing on the wooden railings.

2.3.1 Paved Access Path

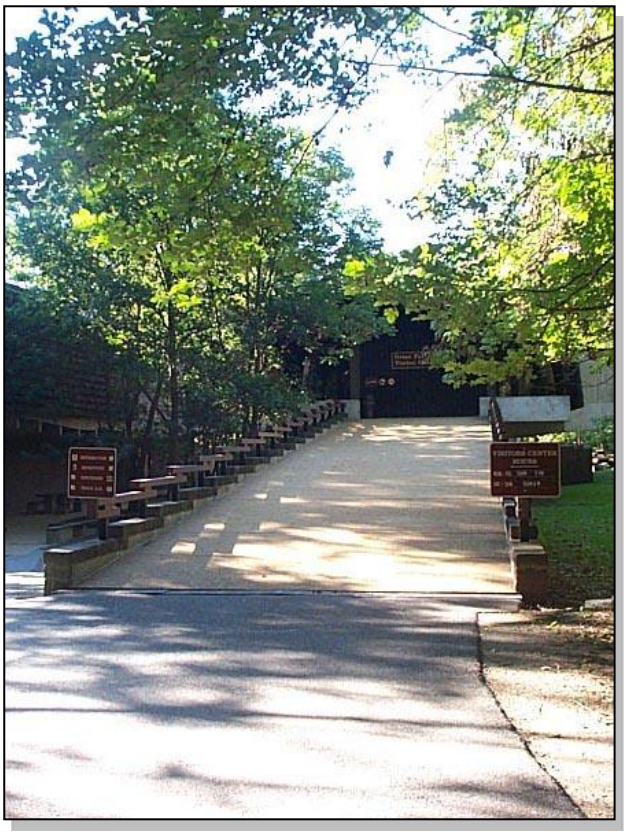
The new paved access path from the parking area to the visitor center would be 155 feet long, and sloped at a 5% grade. The majority of the path would be constructed using a permeable material (i.e. porous concrete or asphalt). The last 28 feet of the path would be elevated by 1 foot to be in compliance with ABA/ADA standards. In relation to the current path, the new paved path would be shifted between 1 to 4 feet to the west to avoid trees that are near the path. Along the

edges of the path, plants and/or rocks would be established to help reduce soil runoff. At the juncture where the access path joins the ramp a small semi circular plaza would allow visitors ABA/ADA compliant access to the visitor center ramp and courtyard (see Figure 2 on the following page). The center of the plaza would include a bench for sitting and an interpretive display that could focus on the unique architecture of the visitor center building or other park resource. A ramp would continue along the outer edge of the plaza providing ABA/ADA access to the courtyard. As an alternative, steps would link the courtyard with the plaza and access path. The size of the structure would be approximately 400 square feet in area. At the base of the north ramp the plaza structure would be approximately 2 feet higher in elevation than existing conditions in order to meet minimal ABA/ADA standards for the construction of the north ramp. In addition this alternative would include a ramp and a courtyard option described below.

2.3.2 North Ramp

The north ramp needs to be brought up to current ABA/ADA standards. This would be done by reconstructing the ramp at an 8% slope with two intermittent landings - flat sections along the distance of the ramp as resting areas (see Figures 3, 4 and 5). The bottom of the ramp would be raised by one and a half feet. Starting from the bottom and going to the top, there would be an 8% incline, 26’8” long, then a flat section 5’4” long. There would be another 8% inclined section, 21’4” long followed by another 5’4” flat section. Finally, there would be a 21’4” 8% inclined section leading to the visitor center doors, which are situated on a level surface. The new ramp would be constructed with exposed aggregate concrete to match existing materials and workmanship.

In addition, under the current hand railings, 4-inch wire mesh panels will be installed to meet safety code (see attached design plans). This design will allow for easy maintenance.



The existing ramp does not comply with ADA/ABA standards.

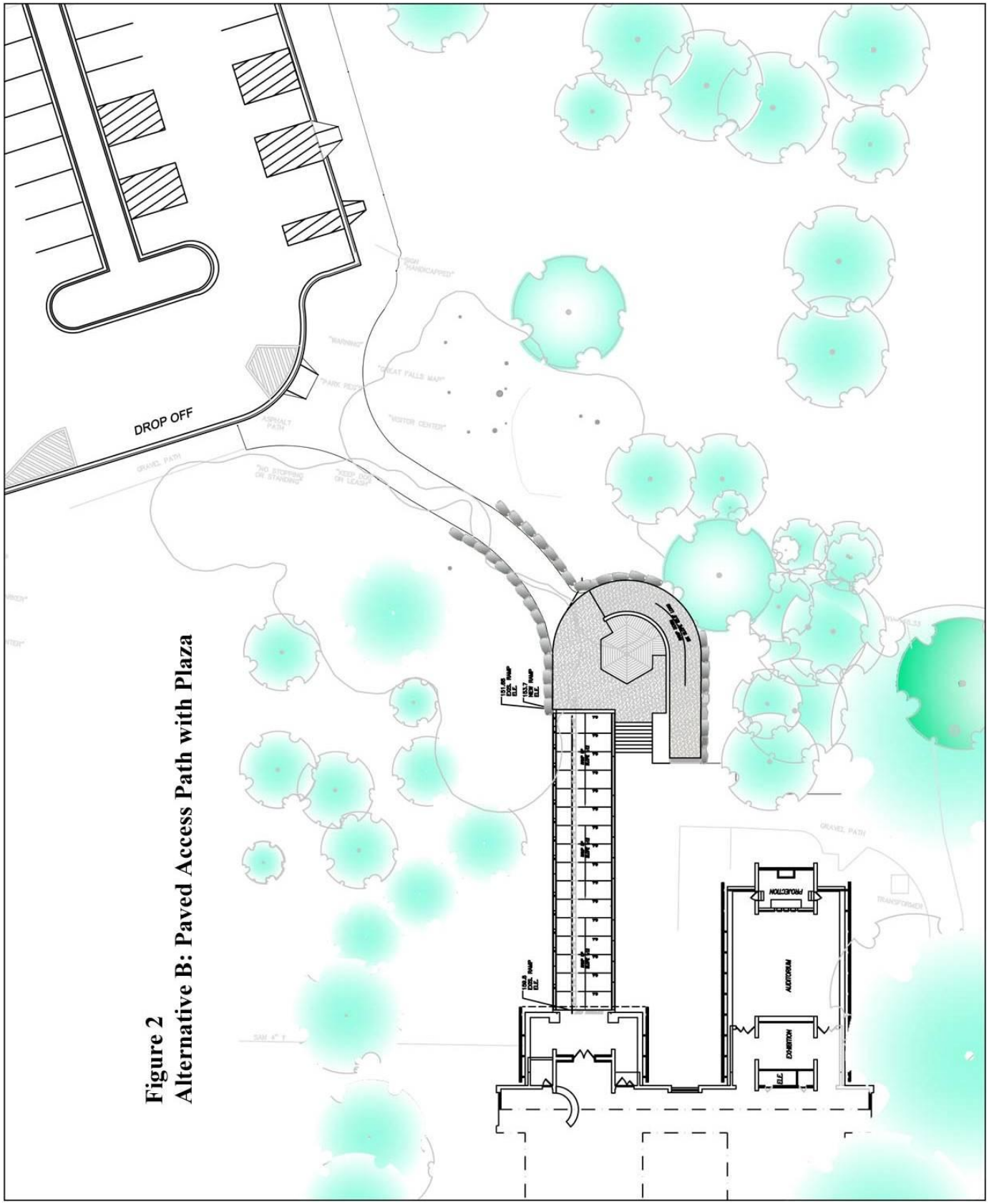


Figure 2
Alternative B: Paved Access Path with Plaza

Figure 3 - Ramp Option

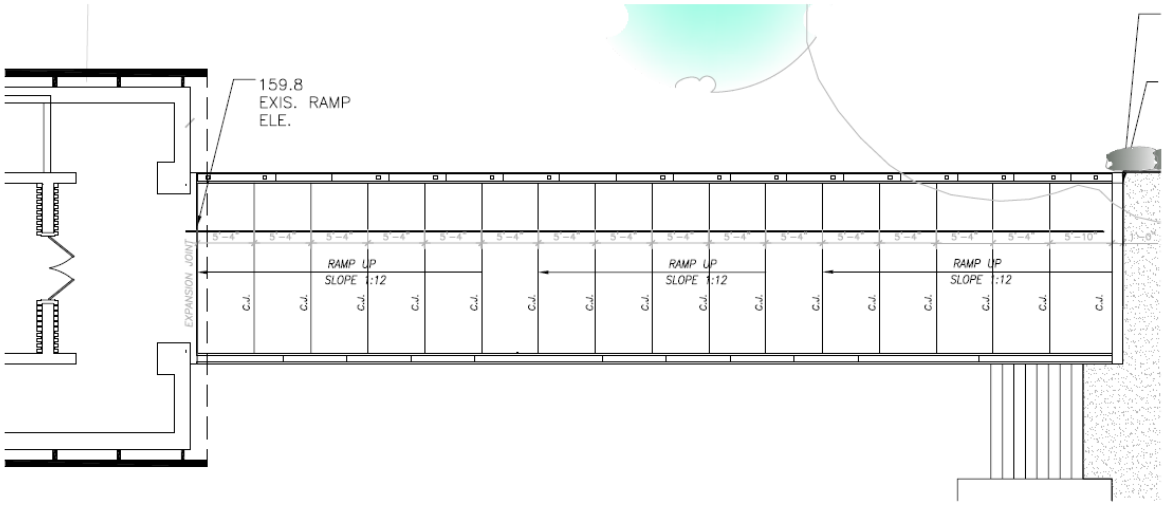


Figure 4 - Ramp Option

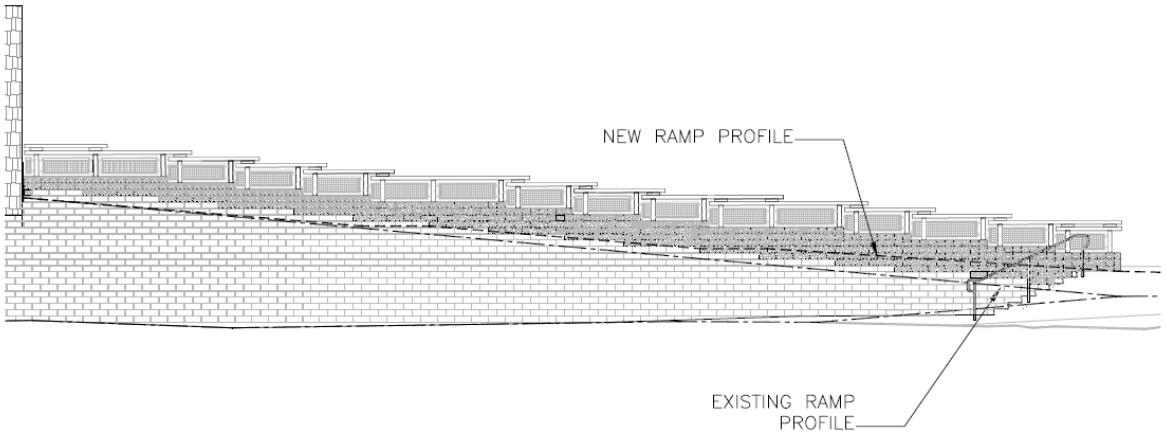
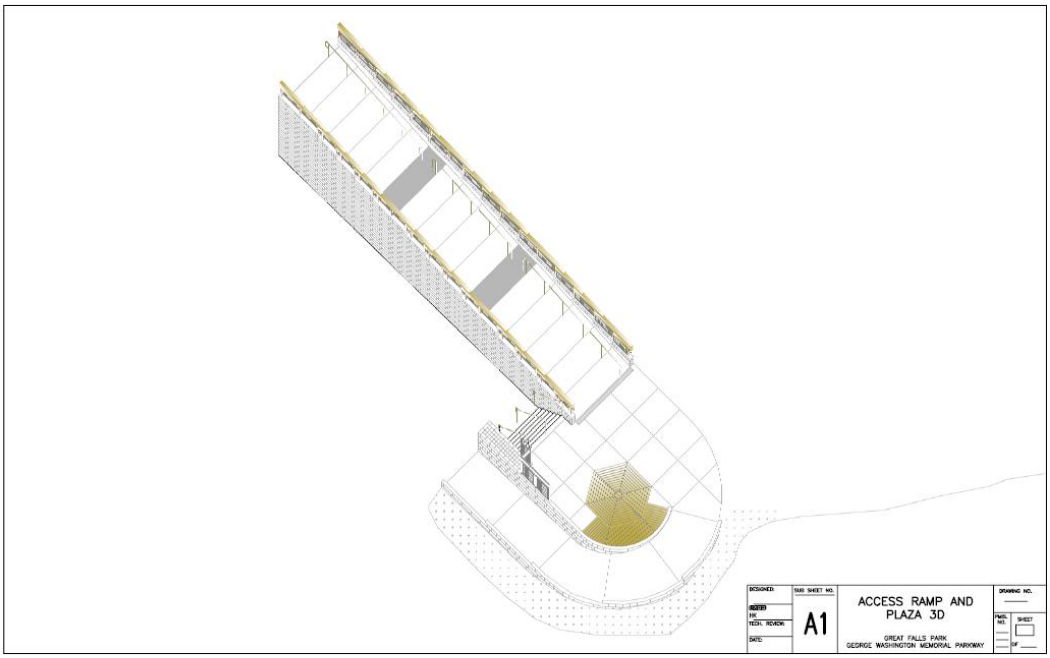
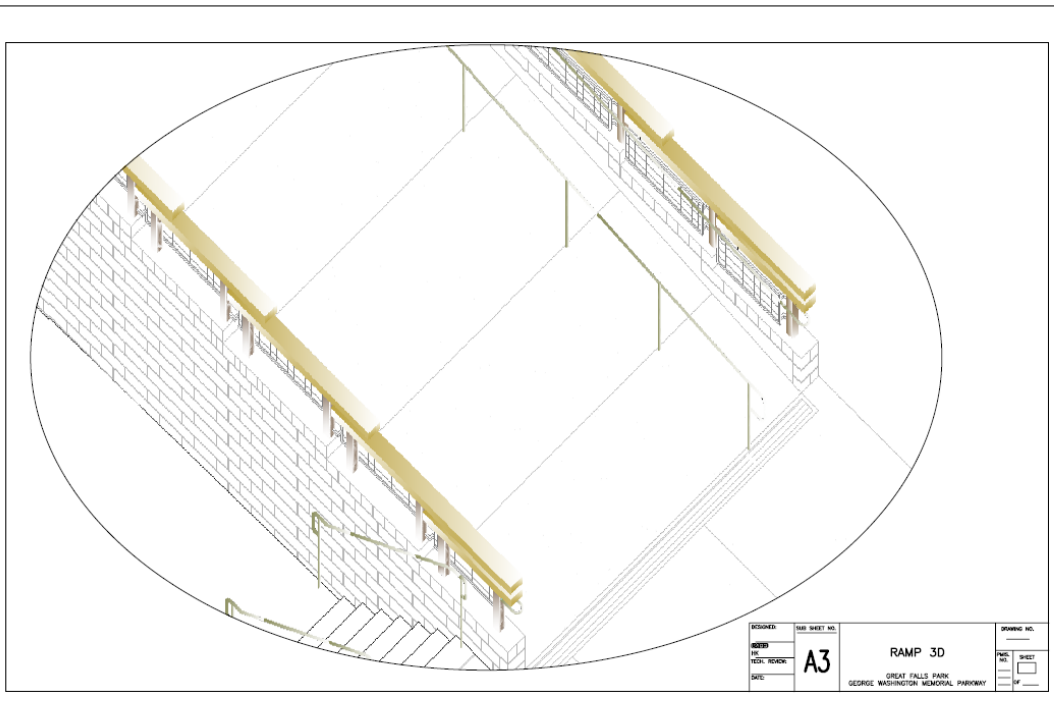


Figure 5 - Ramp Option





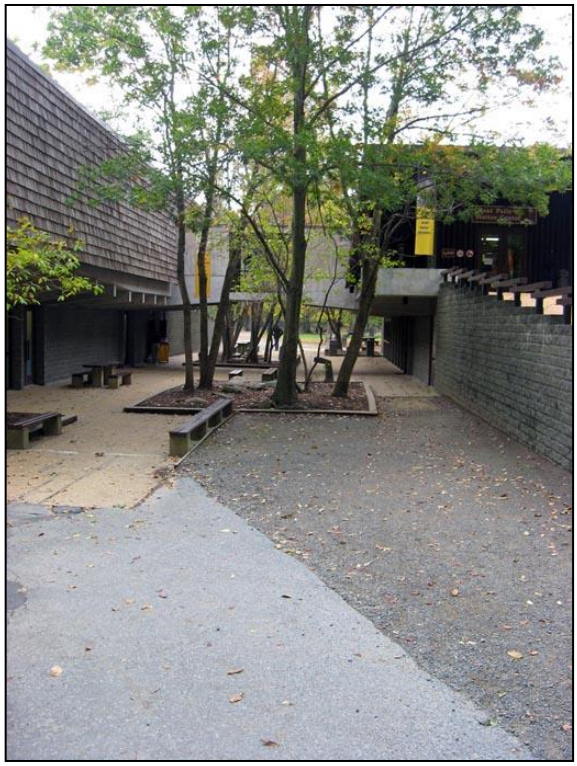
2.3.3 Courtyard

The existing courtyard contains four planter boxes. The planter on the south side contains a 15-inch diameter redbud, and the planter on the north end contains a small 2-inch diameter fringe tree. Of the two planters in the central portion of the courtyard the northern-most one contains six trees (one 15-inch pin oak; three ash 8-inch, 12-inch and 17-inch; and 2 fringe trees, 3.5-inch and 3.5-inch). The other planter contains eight trees and one dead tree (six ash, 6-inch, 6-inch, 6.5-inch, 7-inch, 11.5-inch and 12.5-inch; a 13-inch pin oak, and a 4-inch blue beach). There are currently two drinking fountains on the interior of the courtyard, on opposite sides of each other, and several benches and picnic tables, all oriented parallel with the length of the courtyard. There are six different locations where water drops onto the courtyard surface from downspouts that direct water from the visitor center roof. The courtyard elevation is lower than the north and south ends of the visitor center. The north end of the courtyard has the lowest elevation. These lower elevations have caused water ponding after precipitation.

Listed below are the two different options for the courtyard (see Figures 6 and 7).

Courtyard Option 1 (NPS preferred)

This option expands upon the original design concept and would keep the center of the courtyard open for visitor traffic by eliminating the planter boxes but would increase the area of permeable gravel sections (see Figure 6). The estimated amount of loss of trees due to the reconfiguration of the planters is approximately 143 inches diameter at breast height. Approximately eight new permeable rectangular sections and some linear sections would be designed to capture storm water. The majority of the gravel sections would be landscaped with large boulders representative of the landscape found in the park and purposely made accessible and tangible to the public for sitting or climbing. Like Option 1, the drainage system would be a combination of trench drains and permeable sections feeding to the existing pipes, which would deliver storm water more effectively to the existing drainage system that extends beyond the courtyard and eventually the Potomac River. Water emanating from the buildings downspouts would be managed by directing the water onto the permeable rock sections to drain via rain chains. On the wall next to one of the rectangles of gravel (located just beneath the north ramp) there would be an opening available for an interpretive display accessible to visitors walking through the courtyard. Most picnic tables, benches, and water fountains would be retained but may be relocated to improve visitor circulation.



View looking south in to the courtyard from the north ramp.

Courtyard Option 2

This option would keep the concept of the existing four vegetative planters, but would alter their current size and shape (see Figure 7). Storm water runoff that originates from the visitor center building roof/downspouts would be directed into the planters rather than the courtyard surface. The number of drop inlets would be increased to more effectively move storm water away from the courtyard. Drop inlets would be located along the perimeter of the vegetated planters. The drinking fountains, picnic tables and benches would be rebuilt similar in design and location to existing conditions. In order to provide protection to the courtyard surface from root growth, some trees would be removed and substituted with other appropriate tree and shrub species that would have less potential to cause root damage. The estimated amount of loss of trees due to the reconfiguration of the planters is approximately 143 inches diameter at breast height.

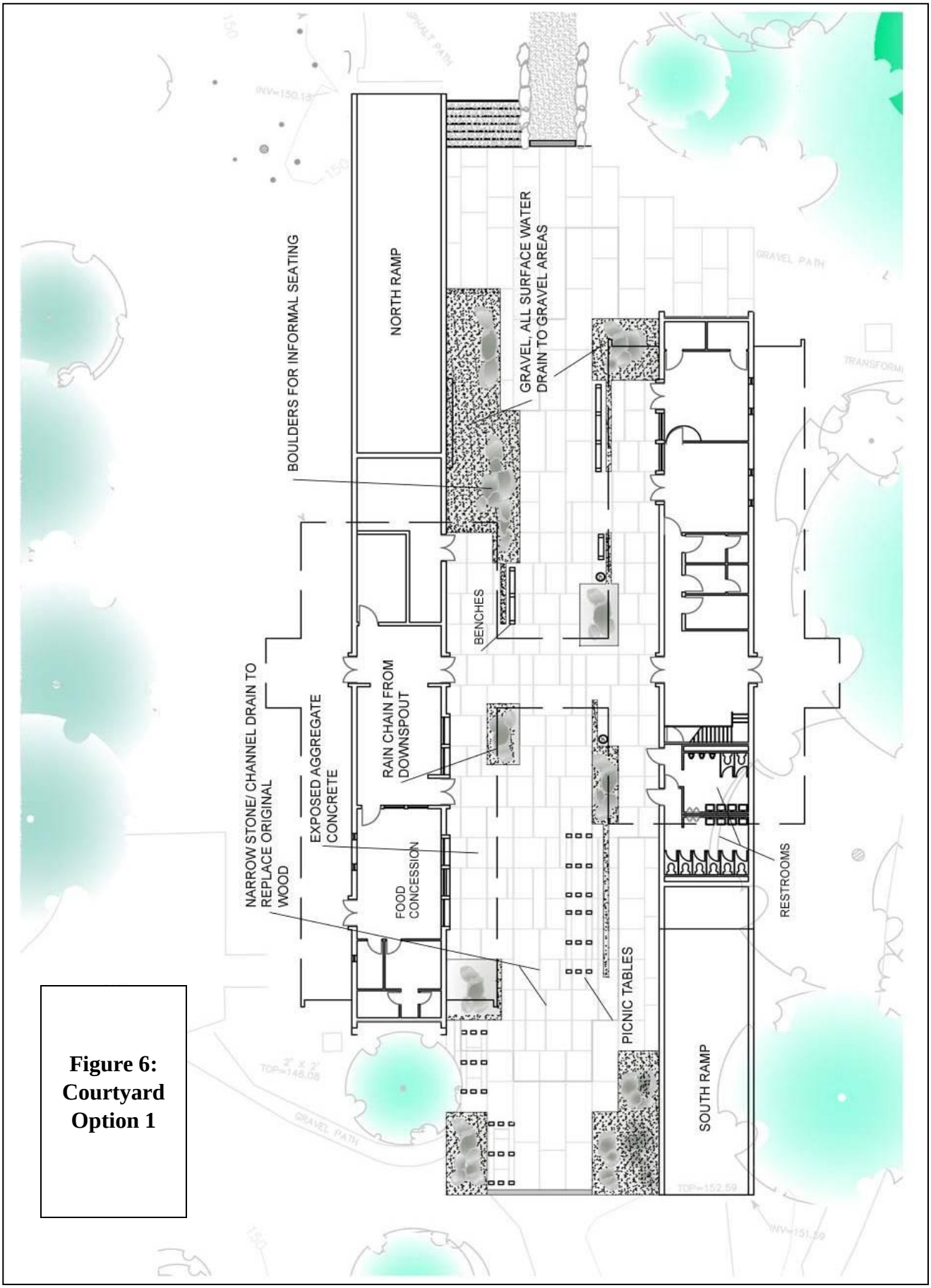


Figure 6: Courtyard Option 1

Figure 7: Courtyard Option 2

2.4 Mitigation Measures

The following mitigation measures have been developed to minimize the degree and/or severity of impacts to the resource, and would be adhered to during implementation of the preferred alternative:

- Construction activities would be scheduled to minimize construction-related impacts upon visitors. Areas not under construction would remain accessible to visitors. A temporary path would be made available from the main parking lot around the west side of the visitor center, through the staff parking, connecting with the southern end of the courtyard.
- Silt fencing would be placed where ground disturbance would occur.
- To the extent possible tree loss due to design and construction would be replaced with native trees approved by the NPS at a ratio of 1:1 diameter breast height (dbh). Appropriate areas within the park would be identified and planned for tree replanting as part of the planning and design.
- Measures shall be taken to avoid ground disturbance and compaction in the work zone, such as placing mats or natural materials down around the work zone. The surrounding trees would be protected as well. All disturbed area would be replanted with species according to a planting plan approved by the GWMP Natural Resource Manager and Landscape Architect.
- Should construction unearth previously undiscovered cultural resources, work would be stopped in the area of discovery and the park would determine the nature and significance of the resource and consult with the State Historic Preservation Officer and the Advisory Council on Historic Preservation, as necessary, according to §36 CFR 800.13, *Post Review Discoveries*.

2.5 Alternatives Considered But Not Carried Forward

Several alternatives or alternative elements were identified during the design process and internal and public scoping. Some of these were determined to be unreasonable, or much less desirable than similar options included in the analysis, and were therefore not carried forward for analysis in this EA. Justification for eliminating alternatives from further analysis was based on factors relating to:

- conflicts with already-established Park uses
- duplication with other less environmentally damaging alternatives
- conflict with the statement of purpose and need, or other policy
- severe impact on environmental or historic resources

The following options were considered, but ultimately dismissed:

Construct Boardwalk Access Path

In this alternative the existing path would be completely removed and replaced with a boardwalk path located about 100 feet to the east of the current path. The entrance to the access path from the parking lot would be shifted approximately 50 feet to the north east from its current location. The boardwalk would be approximately 220 feet long and 10 feet wide with two main sections at a slope of 4.2% or less. At the end of this boardwalk there would be a rectangular shaped plaza with a boardwalk

leading to the north ramp/visitor center, and an elevated landscaped path leading towards the courtyard, with steps as an alternative in the middle. In addition this alternative would include a ramp and a courtyard option described below.

This option was dismissed due to visual impacts, increased maintenance costs, significant impacts to the natural resources (in a previously undisturbed area), and impacts to the national historic resources.

Half- Ramp Option

This option would split the ramp in two, converting the west half of the ramp to be compliant with ABA/ADA standards (see Figure 5). The east side of the current North Ramp would be reconstructed similar to existing conditions. The west side would be narrower and would require extending beyond the existing footprint to raised elevations established on either access path alternatives. The slope would be similar to option 1 with two intermittent landings in the middle of the ramp with the majority of the ramp at 8% slope. Because the west side would be raised above the east side by several feet (to meet ABA/ADA standards), a retaining wall and railing would be required in the center of the ramp, which would be designed to match existing material on the side rails.

This option was dismissed due to the negative visual impact it would have on national historic resource, making it appear drastically different from the original designs.

Long-Ramp Option

An alternative considered was a ramp option that would extend the existing ramp out to connect with the access path for meeting ABA/ADA compliance. This option was rejected because the ramp would need to extend out a minimum of 15 feet into the access path resulting in significant visual impacts and alterations to existing architecture.

Original Courtyard Option

This option would convert the courtyard back to its original design as shown on the original design drawings entitled *The Visitor Center For Great Falls, Virginia*, drawing number NCR 117.1-732, dated May 25, 1966. Compared with the current layout, this option would make the courtyard very spacious. The drainage system would be altered to incorporate either a trench drain or drainage through permeable sections of loose gravel rock, or combination of both. This would involve the removal of the two existing drainage inlets. The main drain pipe located in the middle of the courtyard space would be assessed for capacity and either replaced or retained. This pipe feeds to an 18 inch pipe which eventually feeds to the Patowmack Canal and Potomac River. The drainage system would be improved by increasing the area by which storm water can flow directly to drainage pipes. The planter boxes including the trees would be removed. The estimated amount of loss of trees due to the reconfiguration of the planters is approximately 143 inches diameter at breast height. Other elements such as the picnic tables, benches and drinking fountains would be replaced in similar design and location of existing conditions. The amount of storm water falling onto the hard surface of the courtyard from the visitor center building downspouts would remain the same as existing conditions.

This option was dismissed because it did not address the needs to improve water flow in the courtyard area and to add additional interpretive opportunities to the visitors.

2.6 Environmentally Preferred Alternative:

In accordance with DO-12 and NEPA, the NPS is required to identify the environmentally preferred alternative in its NEPA documents. The Council on Environmental Quality defines the environmentally preferred alternative as the alternative that would promote the national environmental policy as expressed in the National Environmental Policy Act's Section 101. The CEQ states "Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources."

Alternative B (construct paved access path, north ramp and courtyard) with Courtyard Option 1 best meets the criteria for the environmentally preferred alternative. While the no action would not require removal of any vegetation, disturbance of soils, and would protect the original design of the building, this alternative does not meet the ABA standards and, in the case of the ramp, the International Building Code standards. Thus, it is not an acceptable alternative because they would not be in compliance with federal law, regulations, and NPS policy.

Chapter 3: Affected Environment & Environmental Consequences

This chapter analyzes the potential environmental consequences, or impacts, that would occur as a result of implementing the proposed project. Topics analyzed in this chapter include natural resources (vegetation); cultural resources (historic structures and cultural landscapes); visitor use and experience; and facilities and operations.

All remaining impact topics were dismissed because the interdisciplinary team found that, after the completion of the environmental screening form, there would be no impacts to these topics (see chapter 1).

3.1 Methodology for Assessing Impacts

As required by NEPA, potential impacts are described in terms of type (beneficial or adverse), context (site-specific, local, or regional), duration, and level of intensity (negligible, minor, moderate, or major). Both indirect and direct impacts also are described; however, they may not be identified specifically as direct or indirect. These terms are defined below. Overall, these impact analyses and conclusions were based on the review of existing literature and studies, information provided by on-site experts and other government agencies, professional judgments, and park staff insight. The impact analyses presented in this document are intended to comply with both NEPA and Section 106 of the NHPA; therefore, Section 106 summaries for each cultural resource topic also are included.

The following definitions will be used in this EA to describe intensity and duration of impacts.

Intensity. Describes the degree, level, or strength of an impact. For this analysis, intensity has been categorized into negligible, minor, moderate, and major.

Negligible. Little or no impacts (not measurable).

Minor. Changes or disruptions may occur, but do not result in a substantial resource impact.

Major. Easily defined and measurable, resulting in a substantial resource impact.

Impairment. An impact that would harm the integrity of Park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

Adverse. A change that moves the resource away from a desired condition or detracts from its appearance or condition.

Beneficial. A positive change in the condition or appearance of the resource or a change that moves the resource toward a desired condition.

Direct. An effect that is caused by an action and occurs in the same time and place.

Indirect. An effect that is caused by an action but is later in time or farther removed in distance, but is still reasonably foreseeable.

Context. Describes the area or location in which the impact would occur. Are the effects site-specific, local, regional, or even broader?

Duration. Describes the length of time an effect would occur, either short-term or long-term:

- Short-term impacts generally last only during construction, and the resources resume their pre-construction conditions following construction.
- Long-term impacts last beyond the construction period, and the resources may not resume their pre-construction conditions for a longer period of time following construction.

Cumulative Impacts. The Council on Environmental Quality (CEQ) regulations, which implement the National Environmental Policy Act of 1969 (42 USC 4321 et seq.), require assessment of cumulative impacts in the decision-making process for federal

projects. Cumulative impacts are defined as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions" (40 CFR 1508.7). Cumulative impacts are considered for both the No Action and action alternatives.

During scoping the interdisciplinary team identified actions that could potentially add to indirect effects to park resources as a result of the proposed action. The scope of the analysis is limited to the area in and near the visitor center and extends to include the Potomac Gorge due to the ecological importance of the natural environment and the presence of historical remains of the Patowmack Canal.

Past and present actions include preservation maintenance of the Patowmack Canal; installation of a new roof on the visitor center; trail maintenance and stabilization (especially between the visitor center and overlooks); reconstruction of the falls overlooks; repaving of the parking facilities; reconfiguring the north entrance to the visitor center and making visitor center doors ABA/ADA accessible; re-designing the visitor center exhibits; and ongoing invasive plant control.

Future actions could include converting lower level storage to additional restroom facilities; construction of a new park staff facility in the location of the maintenance yard; installation of outdoor interpretive exhibits and cultural resource preservation maintenance.

Impairment. National Park Service's Management Policies 2006 require analysis of potential effects to determine whether or not actions would impair park resources. The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. National Park Service managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values. However, the laws do give the National Park Service the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values.

3.2 Natural Resources

3.2.1 VEGETATION

Affected Environment

The majority of the vegetation affected by this project is located in the planters in the courtyard. Species include two pin oak, nine white ash, two fringe trees, and one blue beach. The ramp would not affect vegetation, and while the access path would be shifted a couple of feet, a maximum of two trees would be impacted.

Environmental Consequences

Methodology

Available information on plants and vegetative communities potentially impacted in the study area was compiled for this document. Predictions about short- and long-term site impacts were based on recent studies and previous projects with similar vegetation. The thresholds of change for the intensity of an impact are defined as follows:

Negligible. No vegetation would be affected, or some individual plants could be affected as a result of the alternative, but there would be no impact to native species populations. The impacts would be on a small scale.

Minor. The alternative would affect some individual plants and also would affect a relatively small portion of that species' population. Mitigation to offset adverse impacts could be required and would likely be successful.

Moderate. The alternative would affect some individual plants and would also affect a

sizeable segment of the species' population over a relatively large area. Mitigation to offset adverse impacts could be extensive but would likely be successful.

Major. The alternative would have a considerable impact on plant populations and affect a relatively large area in and out of the park. Mitigation measures to offset the adverse impacts would be required and extensive, and success of the mitigation measures would not be guaranteed.

Impacts of Alternative A

Impact Analysis.

Under Alternative A, there would be no changes made to the existing condition of the vegetative communities at the site. The trees in the courtyard would continue to be maintained through regular NPS landscaping activities. As a result, there would be no adverse or beneficial impacts to vegetation under Alternative A.

Cumulative Impacts.

Because the implementation of Alternative A would result in no adverse or beneficial impacts to vegetation, there would also be no adverse or beneficial cumulative impacts to vegetation.

Conclusion.

Alternative A would result in no direct, indirect, or cumulative adverse or beneficial impacts to vegetation.

Impacts of Alternative B (NPS Preferred Alternative)

Impact Analysis.

Access Path. This alternative would include construction using a permeable material the access path. A new culvert would need to be placed under the landing area of the access path (adjacent to the end of the north ramp) to direct water through the structure to existing drainage features. Runoff would also be directed to vegetated areas off the trail. During construction any runoff would be managed through appropriate erosion control devices. The alignment of the trail would avoid most trees; however, up to two trees may need to be removed as a result of shifting the path. This alternative would have a direct minor, long term, adverse impact on natural resources.

Ramp. Under this option, all construction activities would fall under the existing footprint of the north ramp. No vegetation would be impacted.

Courtyard. Construction would eliminate the current vegetative planter configuration and would result in the loss of 16 mature trees that were planted in the courtyard. This would return the appearance of the courtyard closer to that of the original design, as there were no trees originally planned for the courtyard. This option would result in minor long term adverse impacts associated with loss of trees.

Construction activities and staging associated with all of the proposed actions under Alternative B would result in limited compaction and trampling of vegetation, resulting in short-term minor adverse impact.

Overall, with the loss of up to 18 trees from the proposed actions associated with the access path and the courtyard, and the impacts from construction activities and staging, there would be short- to long-term minor adverse impacts. Those trees that would be removed would be replaced with native trees, approved by NPS staff, at appropriate locations within the park as part of the planning and design.

Cumulative Impacts.

Present actions that have and continue to contribute to the cumulative impact on vegetation include the ongoing invasive plant control. Continued invasive plant species control has long-term beneficial impacts on the native vegetation of the park. These long-term beneficial impacts, in combination with the long-term minor adverse impacts of Alternative B, would result in long-term beneficial cumulative impacts to vegetation in and around the Great Falls Visitor Center.

Conclusion.

Alternative B would include the removal of no more than two trees along the access path and 16 trees within the courtyard. Construction activities and staging would result in limited compaction and trampling of vegetation. Therefore, Alternative B would result in short-term, minor, adverse impacts, and long-term, minor, adverse impacts as a result of a net loss of vegetation. Alternative B would also result in long-term beneficial cumulative impacts to vegetation in and around the Great Falls Visitor Center. Because there would be no major adverse impacts on a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the park's establishing legislation, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified in the park's general management plan or other relevant NPS planning documents as being of significance, there would be no impairment of park resources or values related to vegetation.

3.3 Cultural Resources

3.3.1 Impacts to Cultural Resources and Section 106 of the National Historic Preservation Act

In this Environmental Assessment, impacts to historic structures, cultural landscapes, and archeological resources are described in terms of type, context, duration, and intensity, which is consistent with the Council on Environmental Quality regulations for implementing the National Environmental Policy Act. These impact analyses are intended to comply with the requirements of both the National Environmental Policy Act and Section 106 of the National Historic Preservation Act. In accordance with the Advisory Council on Historic Preservation's regulations implementing Section 106 (36 CFR Part 800, *Protection of Historic Properties*), impacts to historic structures, cultural landscapes, and archeological resources were identified and evaluated by (1) determining the area of potential effects; (2) identifying cultural resources present in the area of potential effects that are either listed in or eligible to be listed in the National Register of Historic Places; (3) applying the criteria of adverse effect to affected cultural resources either listed in or eligible to be listed in the National Register; and (4) considering ways to avoid, minimize, or mitigate adverse effects.

Under the Advisory Council's regulations, a determination of either *adverse effect* or *no adverse effect* must be made for affected National Register eligible or listed cultural resources. An *adverse effect* occurs whenever an impact alters, directly or indirectly, any characteristic of a cultural resource that qualifies it for inclusion in the National Register (e.g., diminishing the integrity of the resource's location, design, setting, materials, workmanship, feeling, or association). Adverse effects also include reasonably foreseeable effects of the preferred alternative that would occur later in time, be farther removed in distance, or be cumulative (36 CFR 800.5, *Assessment of Adverse Effects*). A determination of *no adverse effect* means there is an effect, but the effect would not diminish in any way the characteristics of the cultural resource that qualify it for inclusion in the National Register.

The Council on Environmental Quality's regulations and the NPS's *Conservation Planning, Environmental Impact Analysis and Decision-making* (Director's Order #12) also call for a discussion of the appropriateness of mitigation, as well as an analysis of how effective the mitigation would be in reducing the intensity of a potential impact (e.g., major to moderate or minor impacts). Any resultant reduction in intensity of impact due to mitigation, however, is an estimate of the effectiveness of mitigation under the National Environmental Policy Act only. It does not suggest that the level of effect as defined by Section 106 is similarly reduced. Cultural resources are non-renewable resources; adverse effects generally consume, diminish,

or destroy the original historic materials or form, resulting in a loss of integrity of the resource that can never be recovered. Therefore, although actions determined to have an adverse effect under Section 106 may be mitigated, the effect remains adverse.

A Section 106 summary is included in the impact analysis section of each alternative. The Section 106 summary is intended to meet the requirements of Section 106 and is an assessment of the effect of the undertaking (implementation of the alternative) on cultural resources, based upon the criterion of effect and the criteria of adverse effect found in the Advisory Council's regulations.

The NPS began consultation with the Virginia State Historic Preservation Office (VA SHPO) in the early stages of this project. An explanatory letter and several initial drawings were sent to the VA SHPO in November, 2009 (see Appendix A). Simultaneous with the 30-day public review of this EA/AOE, the NPS will provide a copy of this document to the VA SHPO for their review and comment. The NPS will be seeking concurrence from the VA SHPO that the proposed undertaking will have no adverse effect on the cultural resources of Great Falls Park.

3.3.2 Impacts to Cultural Resources: Definition of Intensity Levels

For purposes of analyzing potential impacts to Cultural Resources, the thresholds of change for the intensity of an impact are defined as follows:

Negligible. Impact is at the lowest levels of detection with neither adverse nor beneficial consequences. The determination of effect for Section 106 would be *no adverse effect.*

Minor. Adverse impact - alteration of a feature(s) would not diminish the overall integrity of the resource. The determination of effect for Section 106 would be *no adverse effect.*

Moderate. Adverse impact - alteration of a feature(s) would diminish the overall integrity of the resource. The determination of effect Section 106 would be *adverse effect.* A memorandum of agreement (MOA) is executed among the NPS and applicable state or tribal historic preservation officer and, if necessary, the Advisory Council on Historic Preservation in accordance with 36 CFR 800.6(b). Measures identified in the MOA to minimize or mitigate adverse impacts reduce the intensity of impact under NEPA from major to moderate.

Major. Adverse impact - alteration of a feature(s) would diminish the overall integrity of the resource. The determination of effect for Section 106 would be *adverse effect.* Measures to minimize or mitigate adverse impacts cannot be agreed upon and the NPS and applicable state or tribal historic preservation officer and/or Advisory Council are unable to negotiate and execute a memorandum of agreement in accordance with 36 CFR 800.6(b).

Duration. Impacts to historic structures and archeological resources are permanent and irreversible therefore there is no short-term or long-term impact level identified for these resources. For cultural landscapes, short-term effects would last for less than 3 years; long-term effects would be those lasting longer than 3 years.

3.3.3 CULTURAL LANDSCAPES

Affected Environment

The courtyard and access path are the two primary elements of the Great Falls Visitor Center Cultural Landscape. The current conditions of the courtyard differs greatly from the original design and intentions of this area.

The existing access path is an asphalt path approximately 120 feet long and 8 feet wide and rises approximately 3-4 feet from surrounding elevations. The edges of the path are moderately steep and have been filled and patched with trail-mix base material out to about 2 feet from the sides in an effort to

stabilize the path. The asphalt is cracked and failing at points along the edge; and the surrounding trail dirt and rocks become eroded from runoff. The sides of the path are frequently eroded from runoff. The majority of the path meets ABA/ADA slope requirements except for the lower 28 feet where the path meets the north ramp. The path is fairly closely lined with large mature trees.

The visitor center courtyard is approximately 5,900 square feet (4,720 sq. ft. are cement slabs, and 1,180 sq. ft. are vegetative planters. The surface material consists of gray colored exposed aggregate concrete slabs with wood spacers. The lowest point of the courtyard is the centerline; however the lowest elevation is on the northwest corner. Because the center of the courtyard is the lowest point it receives storm water from the north and south ends where the access paths adjoin, from the visitor center roof, in addition to rain falling on the surface. The courtyard has two large drop inlets for storm water located adjacent to the planters, and one small drain inlet on the north end at the foot of the access path. This small drain is inadequate to handle the capacity of storm water in this area. The larger inlets also have a tendency to become clogged and function poorly. The vegetative planters act as barriers to water drainage and are one source, along with grading and inadequate drains, that cause several areas within the courtyard to be wet or moist after precipitation, and which can persist depending on the weather. Wet areas have become a source of moss, algae, slime, mud, puddles, and ice, which are a nuisance and a safety problem. In addition the roof drainage includes eight different downspouts all of which fall directly from above onto the courtyard surface, adding to the drainage issues.

The public restrooms, staff offices, food concession, and drinking fountains are all accessed from the courtyard. The majority of the visitors coming to view the falls or see the visitor center use the courtyard to access the park trails and facilities, thus the courtyard is an area of high visitor circulation. Peak periods can receive approximately 500-800 visitors per hour. Congestion of visitor foot traffic through the courtyard can be high, and vegetative planters tend to force visitors to walk on the sides of the courtyard or cut through the planters.

The courtyard has reached the end of its life cycle and requires regular patch repairs due to spalling and crack formation.

Adjacent to the project area is the cultural landscape of the National Historic Landmark Patowmack Canal. The canal trace is present immediately to the east of the project area, and the visitor center complex marks a major intrusion into the landscape of the canal. Although the visitor center complex is currently being considered for listing as a contributing element to the Great Falls Park National Register Nomination, it could be seen as in conflict with the larger landscape of the canal. Therefore, views to and from the remnants of the Patowmack Canal must be considered when changes are proposed to the visitor center complex.

Environmental Consequences

Impact of Alternative A

Impact Analysis.

The implementation of Alternative A would result in no action. The courtyard has already been modified from its original design and on-going maintenance needs would continue to affect the quality of the landscape. The courtyard would remain as is, requiring constant maintenance to keep up with deteriorating conditions. Flooding and ponding of water would continue to be present, as well as poor circulation of visitor traffic. Based on the maintenance needs of the courtyard and the overall departure from its original design, the Alternative A would have long-term minor adverse impacts on the Great Falls Visitor Center Cultural Landscape.

Section 106 Summary.

Although the cultural landscape has been impacted by changes to the original courtyard design, implementation of Alternative A would generally continue to maintain the spatial relationships and landscape features as originally designed. . After applying the Advisory Council's regulations 36 CFR 800, the NPS finds that Alternative A would have no adverse effect on cultural landscapes.

Cumulative Impacts.

Past and present actions have and continue to contribute to the cumulative impacts on cultural landscapes in and around the visitor center. These projects include the preservation maintenance of the Patowmack Canal; installation of a new roof on the visitor center; trail maintenance and stabilization (especially between the visitor center and overlooks); reconstruction of the falls overlooks; repaving of the parking facilities; and ongoing invasive plant control. These projects all help maintain and protect the historic integrity of this cultural landscape and surrounding areas. These impacts, when added to the long-term minor adverse impacts from Alternative A would result in long-term beneficial cumulative impacts to the cultural landscape of the park. No adverse effect under Section 106 of the National Historic Preservation Act.

Conclusion.

The existing courtyard does not adhere to the plans and designs for the original courtyard and Great Falls Visitor Center. The main difference is the addition of the vegetative planters, which were not on the original plans. The deterioration of the courtyard surface and of the access path surface would continue. Therefore, Alternative A would result in long-term minor adverse impacts on the cultural landscape.

Impact of Alternative B (NPS Preferred Alternative)

Impact Analysis.

Access Path. Repaving the access path with permeable materials and standardizing its width would have no impact on views, and would improve the overall landscape of the visitor center.

Ramp. The proposed changes to the ramp and the addition of a transition area from the access path to the ramp and courtyard would be developed in such a way as to not adversely impact the cultural landscape. The newly accessible ramp would be constructed in such a manner that the new construction would utilize similar materials and construction techniques as are found in the original construction. There would be minimal net rise in height of the ramp and railings, and any changes to meet barrier codes along the ramp would be constructed in such as way as to minimize any impacts to the cultural landscape. The transition from the access path to the ramp/courtyard would result in a new feature being introduced into the landscape, but this would be designed in such a way as to minimize impacts to the cultural landscape. While the addition of this feature would result in minor long term adverse impacts to the cultural landscape, it would be balanced by improvements to the courtyard which would restore the area closer to its original design.

Courtyard. Alternative B has two different options for courtyard design. Courtyard Option 1 (NPS Preferred) is a modification of the original design plans for the courtyard area. It expands upon the small gravel areas to place both decorative and functional boulders representative of the rugged landscape found at the park and landscape elements where visitors may sit or play in the courtyard. The addition of permeable rock boxes serving the drainage system reduces the amount of concrete surface depicted in original plans; however the function of creating an open accessible area is retained similar to original design intent. Since the general appearance and design of the courtyard would be consistent with the original building and architecture, this alternative would not affect the building's eligibility for listing on the National Register of Historic Places.

Alternative B, Courtyard Option 1 would have long term beneficial impacts on cultural landscapes.

For Courtyard Option 2, the courtyard would change slightly from existing conditions by altering and expanding the area of vegetative planters to capture storm water drainage directly below the building's downspouts within the planters. Since the general appearance and design of the courtyard would be consistent with the existing conditions, this alternative would not affect the building's eligibility for listing on the National Register of Historic Places.

Alternative B, Courtyard Option 2 would have long term beneficial impacts on cultural landscapes.

Construction equipment and staging areas needed to implement Alternative B would be located within the cultural landscape, resulting in short-term minor adverse impacts.

Combined with either Courtyard Options 1 or 2, changes to the access path and ramp proposed in Alternative B would result in a minor long term adverse effect, primarily as a result of the addition of a transition feature at the end of the access path.

Section 106 Summary.

Alternative B would introduce a new feature into the landscape at the transition point of the access path, as well as would improve the condition of the courtyard under both courtyard options. The NPS proposes that implementing Alternative B would have a net minor adverse impacts on the cultural landscape as a result of the changes made to the courtyard, access path, ramp, and the small addition at the end of the access path. After applying the Advisory Council's regulations 36 CFR 800, the NPS finds that Alternative B would have no adverse effect on cultural landscapes.

Cumulative Impacts.

Past and present actions have and continue to contribute to the cumulative impacts on cultural landscapes in and around the visitor center. These projects include the preservation maintenance of the Patowmack Canal; installation of a new roof on the visitor center; trail maintenance and stabilization (especially between the visitor center and overlooks); reconstruction of the falls overlooks; repaving of the parking facilities; and ongoing invasive plant control. These projects all help maintain and protect the historic integrity of this cultural landscape and surrounding areas. These impacts, when added to the long-term minor adverse impacts from Alternative B would result in long-term beneficial cumulative impacts to the cultural landscape of the park. No adverse effect under Section 106 of the National Historic Preservation Act.

Conclusion.

Alternative B would result in long-term beneficial impacts as the cultural landscape would be improved through the removal of the planters and improvements to drainage and access path. Alternative B would also result in short-term and long-term, minor, adverse impacts on cultural landscapes, as construction equipment would be located in the landscape and some new features would be temporarily introduced. Alternative B would also result in long-term beneficial cumulative impacts to the cultural landscape of the park. Implementation of Alternative B would result in no adverse effect under Section 106 of the National Historic Preservation Act.

Because there would be no major adverse impacts on a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the park's establishing legislation, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified in the park's general management plan or other relevant NPS planning documents as being of significance, there would be no impairment of park resources or values related to cultural landscapes.

3.3.4 HISTORIC STRUCTURES

Affected Environment

The Great Falls Park Visitor Center is an example of the many Mission 66 structures constructed surrounding the 50th anniversary of the creation of the National Park Service. Designed by architect Kent Cooper in 1966, construction was completed in 1967. Set on a north-south axis, the center consists of two parallel rectangular buildings joined by an elevated walkway. Each building stands two stories high with a wood-shingled mansard roof covering the second story. The design's intent is to evoke the image of two canal boats, and the existing ramps are perhaps meant to represent a ramped walkway leading from a dock.

The north ramp is approximately 86 feet long and 16 feet wide and consists of large exposed aggregate concrete slabs with yellow hue. The majority of the ramp has an earthen base with the rest structural concrete above a utility closet. The slope of the ramp is 9.5%. The sides of the ramp are faced with textured concrete bricks the color of natural stone similar to native rock colors found in the park. On both sides of the ramp a wooden rail is attached to the bricks consisting of lengths of painted 4 x 6 lumber.

The north ramp deck has reached the end of its life cycle and would require regular patch repairs due to spalling and crack formation.

Although the Great Falls Park Visitor Center is not presently listed on the National Register of Historic Places, a draft nomination is currently underway which would include the center as a contributing element to the larger Great Falls Park National Register Nomination. For the purposes of this Environmental Assessment/Assessment of Effects, the center would be considered as if it were already determined eligible for listing on the National Register.

Environmental Consequences

Impact of Alternative A

Impact Analysis.

Under the no action alternative, the NPS would continue management actions that would include repairs to the access path and ramp surfaces as needed. There would be no construction or improvements to the access path and ramp for disabled visitors. A small lift inside the building used by disabled park employees is made available to handicap visitors as warranted, but would not be an accessible route as defined in ABA/ADA standards. Issues with existing traffic and circulation would remain. As a result, there would be no adverse or beneficial impacts to historic structures under Alternative A.

Section 106 Summary.

Alternative A would generally continue to maintain the condition of the visitor center and north ramp. After applying the Advisory Council's regulations 36 CFR 800, the NPS finds that Alternative A would have no adverse effect on historic structures.

Cumulative Impacts.

Because the implementation of Alternative A would result in no adverse or beneficial impacts to historic structures, there would also be no adverse or beneficial cumulative impacts.

Conclusion.

Under the No Action Alternative, there would be no improvements to the ramp and access path. This would require a continued high level of maintenance to prevent tripping hazards, slippery surface, etc and would require extra staff hours to maintain acceptable standards. Alternative A would result in long-term, minor adverse impacts.

Impact of Alternative B (NPS Preferred Alternative)

Impact Analysis.

Access Path. The access path would not be drastically changed from its current alignment. The change from asphalt to a more permeable path would in no way impact the historic

structure of the visitor center and ramp. Within the overall context of the visitor center structure, the new access path would not stand out. In addition, the design of this alternative uses materials and space to blend into the natural environment as much as possible.

At the intersection of the north ramp and the access path, slight changes would be made at that location to meet the elevation of the north ramp. This new transition feature would include steps and a ramp that provides ABA/ADA access to the courtyard; and may includes a small circular interpretive area. This design and construction adds approximately 2 feet of elevation to the built environment in order to make the access path and ramp ABA/ADA accessible. The ramp, steps and interpretive feature adds a new visual element to the landscape, both for the visitor center building and for the Patowmack Canal National Historic Landmark adjacent to the building on the river side. The Patowmack canal is approximately 100 feet east of the access path, and would only be readily visible for a short distance north of the visitor center building, being screened by vegetation. The new transition feature would be designed in such a manner as to lie on the landscape as naturally as possible, and to have as little impact as possible on the historic fabric of the north ramp.

Ramp. The visitor center building, a Mission 66 structure, may be eligible in the near future for listing on the National Register of Historic Places (National Register) and for the purposes of this EA, is considered eligible for listing. There is currently a draft National Register Nomination underway for all of Great Falls Park, which includes evaluations of the National Register contributions and eligibility of the Great Falls Visitor Center.

Under this alternative the north ramp of the visitor center would be reconstructed to be compliant with current ABA/ADA standards. This would require minor elevation changes (approximately 2 feet) at the base of the ramp and reconfiguration of the slope, including two intermittent landings. Metal railings would be placed as grab bars for ABA/ADA access. The overall change in appearance of the ramp would be noticeable; however, the use of materials would match existing types and styles, the visual appearance would be similar to the existing ramp and original designs. The new mesh panels and railings would be treated or painted to limit their visibility or match the architectural elements. These railings are different than the original designs, however they are required to meet with current ADA/ABA standards and would lie lightly on the original design, being as unobtrusive as possible. From a visual standpoint, the changes in elevation, which would include adding an additional course of textured blocks to the wall and railing, would be more noticeable from the courtyard, or the wooded side behind the visitor center. The ramp design would be very similar to the original design and would not diminish the visitor center's eligibility for listing on the National Register of Historic Places. The ramp itself would be no more visible than at present to the Patowmack Canal Trail on the opposite side of the building.

As a result of changes to the north ramp, it may be required in the future to also adjust the north ramp to address safety hazards. When and if this occurs, it is likely that only that ramp barrier (railing) height issue would require addressing, whereas there would be no need to alter the grade of the ramp to meet ADA/ABA standards, as the north ramp would already be accessible at that point

Courtyard. Both Options 1 and 2 of this alternative propose changes to current conditions within the courtyard. As stated previously, the current conditions of the courtyard vary distinctly from the original design and intent. Although much of the courtyard may contain exposed aggregate concrete that is original to the structure, the concrete is well beyond its life cycle and is suffering from severe spalling and cracking. Replacement of this concrete decking would

be done with respect to the original design and attempts would be made to match the original feel and color of this concrete.

Overall, implementation of Alternative B would have a net long-term minor adverse impact on historic structures as a result of the changes made to the courtyard, access path, ramp, and the small addition at the end of the access path.

Section 106 Summary.

Alternative B would introduce a new feature at the transition point of the access path. It would also rehabilitate the courtyard under both courtyard options. There would be substantial changes to the ramp in the form of the regarding of the ramp to meet accessibility standards, and the timber railings would be adjusted to meet modern barricade standards. All of these changes would be made in such a way as to use materials and construction techniques similar to the original structures, and much of the north ramp's historic fabric would be untouched. After applying the Advisory Council's regulations 36 CFR 800, the NPS finds that Alternative B would have no adverse effect on historic structures.

Cumulative Impacts.

Past and present actions have and continue to contribute to the cumulative impacts on the historic structure of the Great Falls Visitor Center. These include the installation of a new roof on the visitor center; trail maintenance and stabilization (especially between the visitor center and overlooks); and reconfiguring the north entrance to the visitor center and making visitor center doors ABA/ADA accessible. Potential future projects may include converting a storage area partly beneath the north ramp into restrooms, reconfiguring the existing public restrooms and ranger offices, and adding an external backup power generator and enclosure. The alterations of the doors and north entrance, as well as the reconfiguration of the interior exhibits, have had negligible impacts to the structure and have beneficial impacts to accessibility and circulation. It is not expected that the installation of additional restrooms, or the installation of the backup generator, would change the footprint of the structure. As a result of adjusting the north ramp, as well as the other changes noted above, the cumulative impacts on historic structures would be long-term minor adverse.

Conclusion.

Implementation of Alternative B would result in long-term minor adverse impacts on historic structures as a result of the changes made to the courtyard, access path, ramp, and the small addition at the end of the access path. Cumulative impacts for all action alternatives taking in consideration that the visitor center structure would be eligible for listing on the National Register are minor and adverse. For the purposes of Section 106, the cumulative impacts of the ramp design and other recent and proposed projects would result in no adverse effect to the historic visitor center structure. Because there would be no major adverse impacts on a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the park's establishing legislation, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified in the park's general management plan or other relevant NPS planning documents as being of significance, there would be no impairment of park resources or values related to historic structures.

3.4 VISITOR USE AND EXPERIENCE

Affected Environment

The visitor experience at the Great Falls Park Visitor Center begins as visitors arrive in the main parking lot. In the current configuration, the drop-off area is very narrow and makes two-lane traffic difficult, especially during the busy times. As the visitor walks down the access path and into the courtyard, the visitor has to avoid tripping hazards created by the eroding access path and large trees in the planter boxes in the courtyard. If the visitor

happens to be in the park during or after storms, they have to avoid water draining off the roof and onto the courtyard, which creates large ponds throughout the entire courtyard. This makes it difficult to access the courtyard.

If a disabled or elderly visitor chooses to enter the main entrance of the visitor center by way of the north ramp, they are presently challenged climbing the ramp. The ramp does not meet code for modern accessibility standards, making access difficult or impossible by some visitors.

Part of the visitor experience is the viewshed of the area around the Great Falls Park Visitor Center. The Organic Act states that NPS units are charged with conserving park scenery, along with all the natural and cultural resources that contribute to important views. In the evaluation of visual resources, both the visual character and the quality of the viewshed within the study area are considered. A viewshed comprises the limits of the visual environment associated with the proposed action including the viewsheds within, into, and out of the study area.

Environmental Consequences

Methodology

Past interpretive and administrative planning documents provided background on changes to visitor use and experience over time. Anticipated impacts on visitor use and experience were analyzed using information from previous studies. Visitor use and experience includes visitor enjoyment/satisfaction, site access and circulation, and visitor safety. Based on these findings, the following intensity levels were developed:

Negligible: Changes in visitor use and/or experience would be below or at the level of detection. The visitor would not likely be aware of the impacts associated with the alternative.

Minor: Changes in visitor use and/or experience would be detectable, although the changes would be slight. The visitor would be slightly aware of the impacts associated with the alternative.

Moderate: Changes in visitor use and/or experience would be readily apparent. The visitor would be aware of the impacts associated with the alternative and would likely be able to express an opinion about the changes.

Major: Changes in visitor use and/or experience would be readily apparent and would be severely adverse or exceptionally beneficial. The visitor would be aware of the impacts associated with the alternative and would likely express a strong opinion about the changes.

Impact of Alternative A

Impact Analysis. Under Alternative A, no changes would be made to the existing views in and around the visitor center. The trees in the courtyard would continue to grow significantly over the passing years, and would increasingly obstruct the view of the visitor center as visitors approach from the main parking lot.

The no action alternative would not provide ABA/ADA improvements to the existing access path and ramp leading to the visitor center. Without these improvements, disabled visitors would not be able to independently access the park visitor center. The park goal of improving traffic and circulation from the parking lot to the visitor center would not be achieved.

In addition, aside from regular maintenance, there would be no improvements to the visitor center courtyard surface and storm water drainage deficiencies. Issues with standing water, moist soil/mud conditions, and growth of algae would persist. These conditions add to a poor aesthetic appearance of the visitor center, and force visitors to avoid sections of the courtyard.

Visitor circulation through the courtyard area would remain the same. Existing arrangement

of vegetative planters would continue to create minor obstructions to circulation flow. During peak visitation times the visitor center courtyard would experience high congestion worsened by conflict between visitor traffic moving through the courtyard and visitors staying in the courtyard while either using restroom facilities, benches, concession operations, or for other purposes.

Alternative A would also not result in changes to the traffic and circulation in the parking lot. Inefficient and potentially unsafe conditions would continue when people stop their cars or busses for dropping off people and blocking access along the parking lot throughway adjacent to the main access path to the visitor center where space is limited. These conditions cause park staff to spend a noticeable amount of time on traffic control and safety, especially during the busy weekends when park staff is needed elsewhere throughout the park.

Overall, the result of Alternative A on Visitor Use and Experience would be minor long-term and adverse.

Cumulative Impacts.

Past, present, and reasonably foreseeable future actions have and continue to contribute to the cumulative impacts on visitor use and experience in and around the visitor center. These projects include preservation maintenance of the Patowmack Canal; installation of a new roof on the visitor center; trail maintenance and stabilization (especially between the visitor center and overlooks); reconstruction of the falls overlooks; repaving of the parking facilities; reconfiguring the north entrance to the visitor center and making visitor center doors ABA/ADA accessible; re-designing the visitor center exhibits; and ongoing invasive plant control. Future actions could include converting lower level storage to additional restroom facilities; installation of outdoor interpretive exhibits and cultural resource preservation maintenance. All of these past, present, and future projects were carried forward to provide for a better and more informative visitor experience. The beneficial impacts of these projects, when combined with the long-term minor adverse impacts of Alternative A, would result in long-term beneficial cumulative impacts to visitor use and experience.

Conclusion.

No changes would be made to the viewsheds, traffic and visitor circulation, and aesthetic resources within the project area. Therefore, Alternative A would result in long-term, minor adverse impacts on visitor use and experience. Overall, there would be long-term beneficial cumulative impacts.

Impact of Alternative B (NPS Preferred Alternative)

Impact Analysis

Access Path. The paved access path would increase accessibility to all visitors by slightly raising the lower elevations to meet with ABA/ADA standards. It would also allow for easier walking, as it would be wider than the current path and eliminate uneven surfaces. The design of a transition area, while providing ABA/ADA access to the courtyard, would also provide some orientation to the visitor center, and an aesthetic transition element where visitors can rest (on a bench) between the courtyard, visitor center and access to parking.

The changes to the parking lot to include a vehicle and bus drop off near the access path would improve safety issues associated with traffic circulation in this location. The median would need to be shifted into an existing parking space; however, with restriping it is possible to avoid any loss of parking space.

Ramp. Under this option the north ramp would become compliant to current ABA/ADA standards offering greater access and opportunity to all visitors.

Courtyard. This option would correct uneven ground surfaces by replacing exposed aggregate concrete slabs with slabs of similar

material and workmanship; eliminate vegetative planters; and replace new picnic tables, benches and drinking fountains. Drainage problems (ponding) would be corrected using a larger array of permeable gravel boxes designed to capture and percolate or feed storm water to the existing 10-inch pipe that feeds to the manhole and eventually the Potomac River. This alternative would also increase the amount of accessible space for visitors to move through and about the courtyard. The incorporation of large boulders would have an aesthetic quality to the courtyard and would also be accessible by visitors to sit or climb. The inclusion of one or two small interpretive areas located against the exterior walls of the building would attract visitors and provide resource information. The loss of the vegetative planters would constitute a loss in a natural element of the courtyard and shade produced by trees; however this would be offset by enhancing the visual character of the visitor center and architecture as expressed in the original designs for the building.

Overall, the impacts of Alternative B on visitor use and experience would be long-term and beneficial. There would be minor, short term negative impacts during construction, but even then visitors would still have access to the visitor center by using the south ramp.

Cumulative Impacts.

Past, present, and reasonably foreseeable future actions have and continue to contribute to the cumulative impacts on visitor use and experience in and around the visitor center. These projects include preservation maintenance of the Patowmack Canal; installation of a new roof on the visitor center; trail maintenance and stabilization (especially between the visitor center and overlooks); reconstruction of the falls overlooks; repaving of the parking facilities; reconfiguring the north entrance to the visitor center and making visitor center doors ABA/ADA accessible; re-designing the visitor center exhibits; and ongoing invasive plant control. Future actions could include converting lower level storage to additional restroom facilities; installation of outdoor interpretive exhibits and cultural resource preservation maintenance. All of these past, present, and future projects were carried forward to provide for a better and more informative visitor experience. The beneficial impacts of these projects, when combined with the long-term minor adverse impacts of Alternative B, would result in long-term beneficial cumulative impacts to visitor use and experience.

Conclusion.

Alternative B would result in short-term minor adverse impacts on visitor use and experience, as construction equipment would be active within the vicinity and some new features would be temporarily introduced. Long-term impacts would be beneficial, and would include the addition of a transition area at the end of the access path, adjustments to the north ramp to meet modern code and accessibility standards, and the rehabilitation of the courtyard. Alternative B, would also result in long-term beneficial cumulative impacts to visitor use and experience.

3.5 FACILITIES AND OPERATIONS

Affected Environment

NPS operations within the study area are combined with management of other structures, including the visitor center and concession stand. Regular operations include trash pickup, filling holes in the access path, ramp and courtyard to minimize tripping hazards, and maintaining the trees in the planters. When staff time and funding are available, NPS staff conducts more extensive maintenance activities on the exterior of the courtyard, including replacement of benches, helping improve drainage, etc. Regular mechanized blowing occurs during the fall (leaves) and winter (snow) to keep the area as clear as possible.

Environmental Consequences

Methodology

Impact analyses are based on the current description of park operations and management presented in this document. This includes the ability to maintain the operations of the park that are the subject of this document. Park operations and management also includes a discussion of appropriate staff to maintain the site and employee safety at the site. The thresholds of change for the intensity of this impact are defined as follows:

Negligible: Park operations and management would not be affected, or the impacts would be at low levels of detection and would not have a noticeable impact on operations.

Minor: The impact would be detectable but would be of a magnitude that would not have a noticeable impact on park operations and management. If mitigation was needed to offset adverse impacts, it would be simple and likely successful.

Moderate: The impacts would be readily apparent and would result in a substantial change in park operations and management in a manner noticeable to staff and the public. Mitigation measures would be necessary to offset adverse impacts and would likely be successful.

Major: The impacts would be readily apparent, would result in a substantial change in park operations and management in a manner noticeable to staff and the public, and be markedly different from existing park operations and management. Mitigation measures to offset adverse impacts would be needed, would be extensive, and their success could not be guaranteed.

Impact of Alternative A

Impact Analysis.

Under Alternative A, no changes would be made to park operations and management. The no action alternative would require fairly high levels of maintenance activities to keep up with repairs and continual deterioration of surfaces along the access path, ramps and courtyard. The surrounding landscape would be regularly maintained by the NPS. As a result of the continued high level of maintenance, the no action alternative would result in long-term minor adverse impacts.

Cumulative Impacts.

Present and reasonably foreseeable future actions that could contribute to the cumulative impacts include ongoing invasive plant; converting lower level storage to additional restroom facilities; construction of a new park staff facility in the location of the maintenance yard; installation of outdoor interpretive exhibits and cultural resource preservation maintenance. These activities add to the overall operational responsibilities of park staff. When combined with the impacts associated with Alternative A, there would be the long-term minor adverse cumulative impacts facilities and operations.

Conclusion.

As a result of Alternative A, there would be long-term minor adverse impacts to facilities and operations as NPS staff would continue to manage and maintain the site and repair and correct problems on an as needed basis. Alternative A would also result in long-term minor adverse cumulative impacts.

Impact of Alternative B (NPS Preferred Alternative)

Impact Analysis.

Access Path. The design of the new paved access path would lower the need for regular maintenance activities. However, as a result of the addition of the new elements and alternative materials the new path, immediate maintenance needs would be minimal.

Additional lighting is proposed on one or both railings of the north ramp and along the access path for visitor safety. One option would likely only require one lamppost at the top of the path adjacent to the main parking lot. Another option would likely require more

lighting at several locations and would be limited to fixtures attached to the boardwalk and railing. To mitigate the effects of nighttime light, timers can be installed to switch lights off at a certain hour, or by manual operation. The installation of lights would have long term minor adverse impacts to wildlife, and beneficial impacts to human health and safety.

Ramp. Under this option there would be no difference in day to day maintenance operations than what is needed on the current ramp. The new construction would reduce the need to perform regular repairs to failing materials in the foreseeable future.

Courtyard. Properly designed, the new drainage system and replacement of the courtyard surface with new concrete slabs would require significantly less maintenance, however gravel areas would have the potential to become disturbed with dislodged gravel and require regular attention. The removal of trees would result in less time spent trimming and caring for the existing trees.

During construction there would be some disruption of food concession operations. The park would coordinate construction to maintain at minimum a small access to the concession window along the building. The park would mitigate any closures by structuring work to enable the concession to operate to the maximum extent during the period of construction; however there would be short term, minor adverse impacts to concession operations.

During the period of construction, areas routinely accessed by park staff would be temporarily closed, however all staff offices can remain operable. Disabled staff may require additional assistance from other staff to access the visitor center and office space, and disabled staff would need to use the temporary access provided to the public.

In addition, the restroom facilities in the courtyard would need to be closed during a portion of construction. This may be mitigated by providing temporary facilities in one or more locations near the project area. Restroom facilities located at the southern end of the picnic area would also be available.

Overall, Alternative B would result in long-term beneficial impacts on park facilities and operations.

Cumulative Impacts.

Present and reasonably foreseeable future actions that could contribute to the cumulative impacts include ongoing invasive plant; converting lower level storage to additional restroom facilities; construction of a new park staff facility in the location of the maintenance yard; installation of outdoor interpretive exhibits and cultural resource preservation maintenance. These activities add to the overall operational responsibilities of park staff. When combined with the impacts associated with Alternative B, there would be the long-term minor adverse cumulative impacts facilities and operations.

Conclusion.

Alternative B would result in short-term minor adverse impacts on park facilities and operations, as construction equipment would be active within the vicinity and some areas would have to be temporarily closed. Long-term impacts would be beneficial, as a result of less day-to-day maintenance activities being required, particularly within the courtyard. In addition, Alternative B would also result in long-term minor adverse cumulative impacts facilities and operations.

Consultation and Coordination

Internal scoping

A two day choosing by advantages (CBA) session at the Great Fall Visitor Center was held in January 2007 to address ABA/ADA issues and alternatives for the North Ramp, South Ramp, Courtyard, and Restrooms. Representatives from the Paralyzed Veterans of America (PVA) were invited to the session to speak for persons with disabilities, and a PVA wheelchair user identified and verified some of the problems in the field.

Public review

The Environmental Assessment will be released for a 30-day public review in May, 2010. To inform the public of the availability of the Environmental Assessment, the National Park Service will publish and distribute a press release in local newspapers and letters to various agencies.

Copies of the EA will be available to the public at Great Falls Park Visitor Center, Turkey Run Headquarters, and Great Falls Library.

The Environmental Assessment is subject to a 30-day public comment period. During this time, the public is encouraged to submit their written comments to the National Park Service. Following the close of the comment period, all public comments will be reviewed and analyzed, prior to the release of a decision document. The National Park Service will issue responses to substantive comments received during the public comment period, and will make appropriate changes to the Environmental Assessment, as needed.

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References

General Management Plan/Environmental Impact Statement for Great Falls Park, Virginia, Fairfax County, Virginia. National Park Service, George Washington memorial Parkway. Fall 2007.

Fleming, G.P. 2007. Ecological communities of the Potomac Gorge in Virginia: composition, floristics, and environmental dynamics. Natural Heritage Tech. Rep. 07-12. Virginia Department of Conservation and Recreation, Division of Natural Heritage, Richmond. Unpublished Report submitted to the National Park Service. 341 pp. plus appendices.

National Park Service, U.S. Department of the Interior

Director's Order #12 and Handbook: Conservation Planning, Environmental Impact Analysis, and Decision Making, Washington D.C., 2000.

Management Policies, National Park Service, U.S. Department of the Interior, Washington D.C., 2006

Keywords

Listed below are several common terms and phrases used throughout this document:

- **ADA**- Americans with Disabilities Act - civil rights law pertaining to state and local governments, and any private property open to public. ADA provisions have been written into the current building code.
- **ABA**- Architectural Barriers Act - pertains to all Federal buildings and sites including DOI and NPS property with provisions and guidelines now similar to ADA.
- **Accessible Route** - a route from parking area to the main entrance to a building complying with ABA/ADA guidelines. Typically this means a path at least 36" wide with a smooth or paved surface, without steps, and with grades less than 5%, or with ramps and landings, with access through the "front" public door (not a side, rear or service door).
- **ADA/ABA Ramp** - a slope over 1:20 (5%) to a maximum of 1:12 (8.33%) with landings spaced at maximum of 2.5 feet vertically. Ramps with more than 6" vertical gain require handrails.
- **CBA -** Choosing by Advantages - A National Park Service planning session for insuring interdisciplinary consideration of NPS objectives and alternatives in recommending decisions. NPS factors considered include:
  1) protection of cultural and natural resources, 2) maintaining /improving condition of natural and cultural resources, 3) providing for public enjoyment (visitor services, recreation, education/interpretation, 4) public health, safety and welfare, 5) improving operational efficiency and sustainability, 6) employee health, safety & welfare, and 7) providing cost effective, environmentally responsible and otherwise beneficial development.

United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

IN REPLY REFER TO:

H4217 (GWMP-GRFA)

November 30, 2009

Ms. Kathleen Kilpatrick
State Historic Preservation Officer
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

ATTN: Marc Holma

Subject: Great Falls Park Visitor Center Entry Way Upgrade, Fairfax County, Great Falls, VA

Dear Ms. Kilpatrick:

The National Park Service (NPS) is planning a project for the Visitor Center (VC) at Great Falls Park (GRFA), a unit of the George Washington Memorial Parkway (GWMP), to alter the entry way in order to meet accessibility standards, to upgrade associated infrastructure, and make the entry more visitor-friendly. The VC, designed by noted Washington, DC architect Kent Cooper in 1965 and constructed by 1968, was part of the NPS Mission 66 efforts to upgrade park facilities in time for the 50th Anniversary of the NPS. While currently not listed on the National Register of Historic Places (NRHP), the VC and the entirety of GRFA have recently been studied and documented through a Historic Resources Study (HRS) and are currently undergoing the NRHP nomination process through part of the HRS contract. Additionally, the NPS plans to look at Mission 66 architecture through a possible NRHP theme study. The nearby Patowmack Canal, a NRHP property and National Historic Landmark, is outside the immediate area of potential effect and is not anticipated to be impacted by the VC entry way undertaking.

In accordance with § 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and the Advisory Council on Historic Preservation's regulations, 36 CFR Part 800, and provisions set forth in the 2008 Servicewide Programmatic Agreement with the National Park Service (PA), we are notifying your office of this proposed undertaking.

Additionally, this correspondence serves to inform you that we will utilize the National Environmental Policy Act (NEPA) Environmental Assessment (EA) process to help satisfy NHPA § 106 responsibilities as per 36 CFR Part 800.8(c).

The main purpose of the entry way undertaking is to improve areas around the visitor center at GRFA to provide accessibility for individuals with disabilities that meets current Americans with Disabilities Act (ADA) standards. Proposed actions include redesigning the access path leading from the main parking lot to the visitor center, modifying the existing north ramp leading to the visitor center, and resurfacing the courtyard. The scope of the project also includes correcting deficiencies in storm water drainage that affects the courtyard and access path; providing a drop-off in the main parking lot that can be used by individual vehicles, and buses; and installation of minimal lighting along the north ramp and entryway to the visitor center for public safety. Copies of schematic concept drawings are enclosed with this correspondence, as is a copy of the recently completed HRS for your records. An EA is underway, and a copy of the draft document will be sent to your office for comment in the near future during the public review period.

Should you have any questions at all regarding this project, please do not hesitate to contact me at 703-289-2500, or GWMP Cultural Resource Manager Matthew Virta at matthew_virta@nps.gov or 703-289-2535.

Thank you for your continued assistance.

Sincerely,

DP Marshall

Dottie P. Marshall
Superintendent

Enclosures